UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative of the Estate of Aldo Vera, Sr.,

12 Civ. 1596 (AKH)

Plaintiff,

VS.

NOTICE OF MOTION FOR STAY OF DISCOVERY PENDING APPEAL

THE REPUBLIC OF CUBA,

Defendant.

PLEASE TAKE NOTICE that upon the accompanying Declaration of Kenneth A. Caruso, the exhibits attached thereto and the accompanying Memorandum of Law, Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"), will move this Court, pursuant to Rule 8(a)(1)(A), of the Federal Rules of Appellate Procedure, on a date and time to be fixed by the Court, for an order granting a stay of discovery pending BBVA's appeal from this Court's Opinion and Order, dated March 17, 2015, denying BBVA's motion for reconsideration and ordering BBVA to provide Aldo Vera with discovery, Docket No. 739, and from this Court's prior order for discovery, dated September 10, 2014. Docket No. 677.

PLEASE TAKE FURTHER NOTICE that papers in opposition to this motion shall be served in accordance with the times set by Local Rule 6.1 unless shortened by the Court.

Dated: New York, New York

April 3, 2015

WHITE & CASE LLP

By:

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